UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 6
1445 ROSS AVENUE, SUITE 1200
DALLAS, TEXAS 75202-2733

January 2, 2014

Mr. Matt Wickham
Pastor, Behling & Wheeler LLC
620 E. Airline
Victoria, TX 77901

Re: EPA's Comments on the Final Draft Technical Scope of Work for AOI-1 Dated
December 31, 2013 for the US Oil Recovery Superfund Site

Mr. Wickham

EPA received a Draft USOR Technical Scope of Work for AOI-1 and Attachment 1 USOR
Site History and Sampling Rationale, both dated December 31, 2013, via email.

EPA has reviewed the revisions made which were factual, editorial, or typographical
corrections, and/or those that were necessary for consistency with the Statement of Work.
EPA concurs with the revisions other than the following items.

1. As agreed upon earlier, instead of using the term "Area of Interest", please revert
    back to using "Area of Investigation" since it is a more appropriate term to use for the
    Site for RI/FS purposes.

2. Below are couple of suggestions for the sentence pertaining to the start of the RI/FS
    work "*Consequently the field work under this Scope of Work will be commenced after
    EPA issues the Notice of Completion of Work for the removal actions at AOI-1 as set
    out in Section XXIX of the Removal Action AOC*":

    • "Consequently, the following schedule will be implemented to perform the
      RI/FS work so as to coordinate and avoid interference with the work pursuant
      to the Removal Action AOC:

      [List schedule of activities]"

    • Or Alternatively – "Consequently, the PRP Group shall include in the Work
      Plan a schedule to perform the RI/FS work so as to coordinate and avoid
      interference with the work pursuant to the Removal Action AOC."

If you have any questions, please contact me at 214-665-8529.

Sincerely,

Raji Josiam
Remedial Project Manager, Superfund Division

<u>Electronic Copy only via Email</u>
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